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9  
10          Counsel for Appellants

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12          **UNITED STATES BANKRUPTCY COURT**  
13          **CENTRAL DISTRICT OF CALIFORNIA**  
14          **RIVERSIDE DIVISION**

15          **In re**  
16          **VALLEY HEALTH SYSTEM, a California**  
17          **Local Health Care District,**  
18          **Debtor.**

19          **PRIME HEALTHCARE MANAGEMENT,**  
20          **INC., a California Corporation; ALBERT L.**  
21          **LEWIS, JR., a taxpayer and resident of the**  
22          **VHS local health care district; JOHN**  
23          **LLOYD, a taxpayer and resident of the VHS**  
24          **local healthcare district; EDWARD J.**  
25          **FAZEKAS, a taxpayer and resident of the**  
26          **VHS local health care district,**

27          **Appellants,**

28          **v.**

1          **VALLEY HEALTH SYSTEM, a California**  
2          **local health care district, DOES 1 – 10,**

3          **Appellee,**

4          **PHYSICIANS FOR HEALTHY**  
5          **HOSPITALS, INC., a California**  
6          **Corporation,**

7          **Real Party in Interest.**

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9          **Case No. 10-CV-00730-SVW**

10          **Chapter 9**

11          **APPELLANTS' APPLICATION FOR**  
12          **EXTENSION OF TIME FOR FILING**  
13          **BRIEF**

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15          **On appeal from Bankruptcy Court Case**  
16          **No. 6:07 -bk-18293-PC**

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18          The Honorable Stephen V. Wilson.

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20          Courtroom 6  
21          312 N. Spring Street  
22          Los Angeles, CA 90012

1                   **TO THE COURT, THE OFFICE OF THE UNITED STATES TRUSTEE,**  
2                   **AND OTHER PARTIES OF INTEREST:**

3                   **PLEASE TAKE NOTICE THAT**, pursuant to Local Rule of Bankruptcy  
4 Procedure 8009-5.6, movants and appellants Save The Hospitals, Inc., a California corporation;  
5 Prime Healthcare Services, Inc., a Delaware corporation; Albert L. Lewis, Jr., John Lloyd, and  
6 Edward J. Fazekas, all taxpayers and residents of the Valley Health System local healthcare  
7 district (together, the “Appellants”) hereby file this application (the “Application”) for a 45 day  
8 extension of time for filing their opening brief in the above captioned appeal. In support of this  
9 Application, the Appellants submit the declaration of Nathan M. Smith (the “Smith  
10 Declaration”), attached hereto as Exhibit A, and respectfully state as follows:

11                  The Appellants’ Brief is currently due on August 30, 2010 and there have been no  
12 previous requests for extensions. Smith Declaration at ¶ 2.

13                  Valley Health System and Physicians for Healthy Hospitals, Inc. (“PHH”)  
14 (together, the “Appellees”) **do not** oppose the proposed extension. Smith Declaration at ¶ 5.

15                  The Appellants are requesting this extension for two reasons. First, the appeal  
16 may become moot if PHH and VHS complete the transaction to purchase the Valley Health  
17 System assets, the propriety of which is the subject of this litigation. Smith Declaration at ¶ 3 .  
18 PHH currently has until September 15 to close the transaction. Smith Declaration at ¶ 3.  
19 Second, an extension will permit additional time to seek a nonjudicial resolution of the dispute.  
20 Smith Declaration at ¶ 3.

21                  The Appellants are requesting an additional 45 days to file their brief which  
22 would make the brief due on October 14, 2010. Smith Declaration at ¶ 4.

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WHEREFORE, the Appellants respectfully request that the deadline for filing the Appellants' opening brief is extended until October 14, 2010.

Respectfully Submitted,

Dated: August 19, 2010

Los Angeles, California

/s/ Nathan M. Smith

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ATTORNEYS FOR SAVE THE HOSPITALS, INC., A CALIFORNIA CORPORATION; PRIME HEALTHCARE SERVICES, INC., A DELAWARE CORPORATION; ALBERT L. LEWIS, JR., A TAXPAYER AND RESIDENT OF THE VHS LOCAL HEALTHCARE DISTRICT; JOHN LLOYD, A TAXPAYER AND RESIDENT OF THE VHS LOCAL HEALTHCARE DISTRICT; AND EDWARD J. FAZEKAS, A TAXPAYER AND RESIDENT OF THE VHS LOCAL HEALTHCARE DISTRICT.